

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NEALY L. SKELDON,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 25-cv-06078
)	
DERMACARE USA CORPORATION, d/b/a)	
“DERMACONCEPTS,” a Massachusetts)	
Corporation, ROBERT LEWIS TROW, an)	
individual; CAROL SIMRA TROW, an individual,)	Hon. Joan B. Gottschall
MICHAEL LUCICH, an individual; and)	Magistrate Judge Jeffrey T. Gilbert
BRITTANY PIKE, an individual,)	
)	
Defendants.)	

**DEFENDANTS’ PARTIAL OPPOSITION TO PLAINTIFF’S
MOTION TO REQUEST TIME TO REDRAFT COMPLAINT**

Defendants DermaCare USA Corporation d/b/a DermaConcepts (“DermaConcepts”) Robert Trow (“Robert Trow”), Carol Trow (“Carol Trow”), Michael Lucich (“Lucich”), and Brittany Pike (“Pike”) (Robert Trow, Carol Trow, Lucich and Pike are referred to as the “Individual Defendants” and they are referred to with DermaConcepts as “Defendants”) state as follows:

1. On July 10, 2025, Plaintiff Nealy L. Skeldon filed a Motion to Request Time to Redraft her Complaint, seeking 21 additional days beyond the 21 days provided for in Fed. R. Civ. P. 15(a)(1)(B) to redraft the complaint (to July 31, 2025). Defendants do not oppose granting Plaintiff an additional 14 days (to July 24, 2025) to redraft the complaint, but do oppose Plaintiff’s request for the additional seven days beyond July 24, 2025.

2. On May 27, 2025, Plaintiff filed her Complaint through her former attorney, Vlad Chirica.

3. On June 20, 2025, Defendants filed motions to dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b).

4. On June 24, 2025, Plaintiff's current attorneys—Thomas Koessl and Hilarie Carhill, of Williams, Bax & Saltzman, P.C.—filed their appearances.

5. Fed. R. Civ. P. 15(a)(1)(B) provides that a plaintiff may amend a complaint “as a matter of course no later than: ... 21 days after service of a motion under Rule 12(b).” Accordingly, this Rule provided that Plaintiff had the opportunity, as a matter of course, to amend her Complaint by July 11, 2025 (*i.e.*, 21 days after Defendants filed their motions to dismiss and 17 days after her new counsel made their appearances).

6. Defendants believe that an additional 14 days beyond the time provided by Fed. R. Civ. P. 15(a)(1)(B) is reasonable and sufficient and thus oppose Plaintiff's request for an additional seven days.

WHEREFORE, Defendants respectfully request that the Court not extend Plaintiff's deadline to submit an amended complaint beyond July 24, 2025.

Dated: July 16, 2025

Respectfully submitted,

ROBERT LEWIS TROW, CAROL SMIRA
TROW, MICHAEL LUCICH, and
BRITTANY PIKE

By: /s/ Richard R. Winter
One of Their Attorneys

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